

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

DANIEL JOSEPH LINDGREN

INDICTMENT

Case No. _____

Violation: 18 U.S.C. §§ 1344 and 2

Scheme

DANIEL JOSEPH LINDGREN was an adult resident of West Fargo, North Dakota, who was hired by Shorestone Development on about November 1, 2021. Shorestone Development is a real estate construction, rental, and development business owned by M.P. and located in Fargo, North Dakota. DANIEL JOSEPH LINDGREN served as the chief operating officer of Shorestone Development, as well as of some smaller related businesses. In his role as COO, DANIEL JOSEPH LINDGREN had access to a business bank account for each business, a rubber stamp with the owner's signature, and authorization to issue checks and move money between businesses for business purposes. DANIEL JOSEPH LINDGREN was paid approximately \$35 per hour and worked approximately 40 hours per week while COO of Shorestone Development.

Beginning at least as early as July 1, 2022, through October 2024, DANIEL JOSEPH LINDGREN wrote unauthorized checks to himself from a bank account belonging to Shorestone Development. DANIEL JOSEPH LINDGREN issued approximately 274 checks from Shorestone Development, to himself, in various personal accounts, in an approximately aggregate total of \$2,848,680.

DANIEL JOSEPH LINDGREN also made numerous unauthorized charges to a credit card account belonging to Shorestone Development.

COUNT ONE

Bank Fraud

The Grand Jury Charges:

Between as early as July 1, 2022, and October 28, 2024, the Defendant,

DANIEL JOSEPH LINDGREN

did knowingly execute and attempt to execute the above-described scheme or artifice to defraud Bremer Bank, and to obtain any of the moneys, funds, credits, assets, securities, or other property owned by or under the custody or control of Bremer Bank whose deposits were and are insured by the Federal Deposit Insurance Corporation, by means of false or fraudulent pretenses, representations, or promises, to wit: the Defendant drafted checks from the Shorestone Development account using the stamped signature of M.P., issued to DANIEL LINDGREN, and deposited the same in accounts owned or controlled by DANIEL JOSEPH LINDGREN, each check representing a separate execution of the scheme, to wit: DANIEL JOSEPH LINDGREN drafted check number 16608, in the amount \$12,750, dated September 30, 2024, to DANIEL LINDGREN from Shorestone Development bank account ending XXXX624;

In violation of Title 18, United States Code Section 1344.

COUNT TWO

Bank Fraud

The Grand Jury further Charges:

Between as early as July 1, 2022, and October 28, 2024, the Defendant,

DANIEL JOSEPH LINDGREN

did knowingly execute and attempt to execute the above-described scheme or artifice to defraud Bremer Bank, and to obtain any of the moneys, funds, credits, assets, securities, or other property owned by or under the custody or control of Bremer Bank whose deposits were and are insured by the Federal Deposit Insurance Corporation, by means of false or fraudulent pretenses, representations, or promises, to wit: the Defendant drafted checks from the Shorestone Development account using the stamped signature of M.P., issued to DANIEL LINDGREN, and deposited the same in accounts owned or controlled by DANIEL JOSEPH LINDGREN, each check representing a separate execution of the scheme, to wit: DANIEL JOSEPH LINDGREN drafted check number 16620, in the amount \$15,000, dated October 9, 2024, to DANIEL LINDGREN from Shorestone Development bank account ending XXXX624;

In violation of Title 18, United States Code Section 1344.

COUNT THREE

Bank Fraud

The Grand Jury further Charges:

Between as early as July 1, 2022, and October 28, 2024, the Defendant,

DANIEL JOSEPH LINDGREN

did knowingly execute and attempt to execute the above-described scheme or artifice to defraud Bremer Bank, and to obtain any of the moneys, funds, credits, assets, securities, or other property owned by or under the custody or control of Bremer Bank whose deposits were and are insured by the Federal Deposit Insurance Corporation, by means of false or fraudulent pretenses, representations, or promises, to wit: the Defendant drafted checks from the Shorestone Development account using the stamped signature of M.P., issued to DANIEL LINDGREN, and deposited the same in accounts owned or controlled by DANIEL JOSEPH LINDGREN, each check representing a separate execution of the scheme, to wit: DANIEL JOSEPH LINDGREN drafted check number 16623, in the amount \$15,000, dated October 14, 2024, to DANIEL LINDGREN from Shorestone Development bank account ending XXXX624;

In violation of Title 18, United States Code Section 1344.

COUNT FOUR

Bank Fraud

The Grand Jury further Charges:

Between as early as July 1, 2022, and October 28, 2024, the Defendant,

DANIEL JOSEPH LINDGREN

did knowingly execute and attempt to execute the above-described scheme or artifice to defraud Bremer Bank, and to obtain any of the moneys, funds, credits, assets, securities, or other property owned by or under the custody or control of Bremer Bank whose deposits were and are insured by the Federal Deposit Insurance Corporation, by means of false or fraudulent pretenses, representations, or promises, to wit: the Defendant drafted checks from the Shorestone Development account using the stamped signature of M.P., issued to DANIEL LINDGREN, and deposited the same in accounts owned or controlled by DANIEL JOSEPH LINDGREN, each check representing a separate execution of the scheme, to wit: DANIEL JOSEPH LINDGREN drafted check number 16625, in the amount \$20,000, dated October 14, 2024, to DANIEL LINDGREN from Shorestone Development bank account ending XXXX624;

In violation of Title 18, United States Code Section 1344.

FORFEITURE NOTICE

Upon conviction of one or more of the offenses charged in this Indictment,

DANIEL JOSEPH LINDGREN

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(c) and 28 U.S.C. § 2461(c), all right, title, and interest in any property, real or personal, which constitutes or is derived from proceeds traceable to violation(s) of 18 U.S.C. § 1344.

If any of the assets subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, as a result of any act or omission of DANIEL JOSEPH LINDGREN:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) to seek forfeiture of any other property of defendant's up to the value of said property subject to forfeiture.

A TRUE BILL:

/s/ Foreperson
Foreperson

/s/ Mac Schneider
MAC SCHNEIDER
United States Attorney

MDG/alk